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- a user interface configured to allow a user to *select existing text* in a non-native language and view a translation of the selected text in a native language; and
- a cross-language reading wizard comprising:
- a parser for parsing selected text into individual translation units,
- a word translation selector for choosing candidate word translations for the translation units, and
- a translation generator for translating the candidate word translations into corresponding words or phrases in the native language that can be presented to the user via the user interface.

In making out a rejection of this claim, the Office argues that Duan discloses all of the elements of the claim. In regards to the first bulleted element of the claim as listed above, the Office states that “selecting a portion of a text is inherently disclosed [by Duan] within the process of translating an input [of] a text (col. 2, lines 16-17).” (*Office Action of 11/18/05*, p. 2). While Applicant respectfully disagrees as outlined in response to the previous Office Action, Applicant has nevertheless amended the claim in order to further clarify the subject matter and streamline prosecution. Applicant therefore traverses the rejection and respectfully submits that Duan does not anticipate this claim.

More specifically, Applicant submits that Duan does not teach “a user interface configured to allow a user to *select existing text* in a non-native language and view a translation of the selected text in a native language”, as recited in claim 1. A non-limiting example of Applicant’s disclosure is shown in Applicant’s Fig. 9, depicted below. As shown in the figure, a user is able to select existing text in an electronic document.

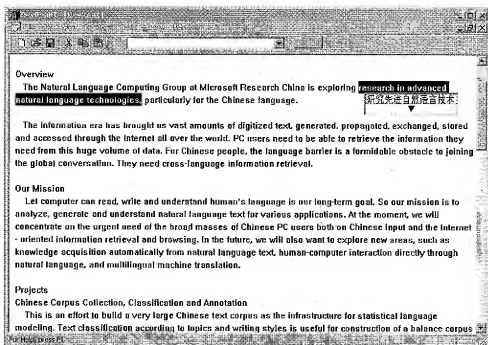


Fig. 9

Duan, meanwhile, teaches a natural language translation system that translates *input text* from a source language to a target language. This may include sentences typed into a keyboard or output from a speech recognition system. (Duan, col. 4, line 64-col. 5, line 10). The passage of Duan cited by the Office, depicted below, supports this characterization.

Language-neutral methods for syntactic analysis, transfer, and morphological and syntactical generation of feature structures are utilized by a natural language translation system to translation an input expression in a source language into an output expression in a target language.

(Duan, col. 2, lines 13-17). As described in this cited passage, Duan describes a system that "translat[es] *an input expression*". In other words, Duan

discloses a system where a user must *input* the expression that he or she wishes to translate. Duan, however, does not anywhere disclose, teach or suggest “a user interface configured to allow a user to *select existing text*” as recited in Applicant’s claim. (emphasis added).

For at least this reason, Duan does not anticipate and this claim is allowable.

**Claims 2-3, 5-8 and 10-11** depend from claim 1 and are allowable as depending from an allowable base claim. These claims are also allowable for their own recited features which are not disclosed by Duan.

**Claims 4, 9 and 12-13** also depend from claim 1 and are also allowable as depending from an allowable base claim. While the Office further cites McCarley and Carbonell in rejecting these claims, these references are not seen to add anything of substance to the rejection of the base claim. As such, these claims are allowable. Furthermore, these claims are also allowable for their own recited features which are not disclosed, taught or suggested by the cited references, either alone or in combination.

**Claim 14** has been amended and, as amended, recites a reading system comprising [emphasis added]:

- a user interface configured to allow a user to *select existing English language text* and view a Chinese language translation of the selected text; and
- a cross-language reading wizard comprising:
  - a parser for parsing selected text into individual translation units,
  - a word translation selector for choosing candidate word translations for the translation units, and
  - a translation generator for translating the candidate word translations into corresponding phrases in the Chinese language that can be presented to the user via the user interface.

1  
2 In making out a rejection of this claim, the Office cites Duan as teaching all  
3 of the elements of the claim except for viewing "a Chinese language translation of  
4 the selected text". The Office, however, cites Brown as teaching this element  
5 before rejecting the claim as obvious.

6 Applicant respectfully but strongly submits, however, that Duan does not  
7 teach "a user interface configured to allow a user to *select existing English*  
8 *language text*" as recited in Applicant's claim 14. Therefore, this claim is  
9 allowable for all of the reasons discussed above in regards to claim 1.

10 **Claim 15** depends from claim 14 and is allowable as depending from an  
11 allowable base claim. While the Office further cites McCarley in rejecting this  
12 claim, the added reference is not seen to add anything of substance to the rejection  
13 of the base claim. As such, this claim is allowable. Furthermore, this claim is also  
14 allowable for its own recited features which are not disclosed, taught or suggested  
15 by the cited references, either alone or in combination.

16 **Claim 58** has been amended and, as amended, recites a reading system  
17 comprising [emphasis added]:

- 18
- 19 • a user interface configured to allow a user to *select existing text* in a
  - 20 non-native language and view a translation of the selected text in a
  - 21 native language, wherein the user interface displays text translations
  - 22 adjacent text the user has selected for translation; and
  - 23 • a cross-language reading wizard comprising:
  - 24 • a parser for parsing selected text into individual translation units, the
  - 25 parser comprising a part-of-speech/base noun phrase identification
  - module for tagging individual words with identifiers,
  - a word translation selector for choosing candidate word translations
  - for the translation units, and

- a translation generator for translating the candidate word translations into corresponding words or phrases in the native language that can be presented to the user via the user interface.

In making out the rejection of this claim, the Office cites Duan as teaching all of the elements of the claim except for “wherein the user interface displays text translations adjacent text the user has selected for translation”. The Office, however, then cites Adachi as teaching this element before stating that it would have been obvious to combine these teachings. The Office’s proffered motivation for this combination consists of “not slow[ing] down the user’s reading by diverting his attention far from the source language.” (*Office Action of 11/18/05*, p. 8-9).

First, Applicant respectfully submits that this rejection is traversed for the reasons discussed above in regards to claim 1. Namely, Duan does not teach or suggest “a user interface configured to allow a user to *select existing text*” as recited in Applicant’s claim. (emphasis added). While Adachi is not cited as teaching such an element, Applicant further notes that Adachi does not teach any such element. Similar to Duan, Adachi teaches a “machine translation processor [] for processing an original sentence . . . that is *input*” into the system. Therefore, neither of the cited references teach Applicant’s claim, and this claim is allowable for all of the reasons discussed above in regards to claim 1.

Applicant further submits, however, that the Office has also failed to present a *prima facie* case of obviousness by failing to show a proper motivation to combine the cited references. Applicant respectfully reminds the Office that in order for a proper obviousness rejection, there must be some suggestion or motivation, *either in the references themselves or in the knowledge generally*

1 available to one of ordinary skill in the art, to modify the reference or to combine  
2 reference teachings. *In re Jones*, 958 F.2d 347, 21 USPQ2d 1941 (Fed. Cir.  
3 1992); *In re Fine*, 837 F.2d 1071, 5 USPQ2d 1596 (Fed. Cir. 1988). Applicant  
4 further reminds the Office that “[i]t is *impermissible to use the claimed invention*  
5 *as an instruction manual or ‘template’* to piece together the teachings of the prior  
6 art so that the claimed invention is rendered obvious.” *In re Fritch*, 23 USPQ2d  
7 1780, 1784 (Fed. Cir. 1992) (quoting *In re Fine*, 837 F.2d 1071, 1075, 5 USPQ2d  
8 1596, 1600 (Fed. Cir. 1988)) (emphasis added).

9 Not only does the Office’s proffered motivation to combine not appear  
10 anywhere in the references, but it also appears to be eerily similar to language  
11 used in Applicant’s disclosure. To illustrate, the Office states that it would have  
12 been obvious to combine the teachings in order to “not slow down the user’s  
13 reading by diverting his attention far from the source language”. (*Office Action of*  
14 *11/18/05*, p. 9). Applicant’s disclosure, meanwhile, touts some of the benefits of  
15 their embodiments in the following manner:

16 By positioning the translation window closely adjacent the translated  
17 text, the user’s eyes are not required to move very far to ascertain the  
18 translated text. This, in turn, reduces user-perceptible distraction  
19 that might otherwise persist if, for example, the user were required to  
20 glance a distance away in order to view the translated text.

21 (*Applicant’s specification*, p. 23-24). Because the Office has not shown  
22 where the cited references display the proper motivation to combine, and because  
23 the proffered motivation appears to mimic Applicant’s disclosure, the Office has  
24 failed to present a *prima facie* case of obviousness.

25 For at least this additional reason, this claim is allowable.

1       **Claims 59 and 60** depend from claim 58 and are allowable as depending  
2 from an allowable base claim. Furthermore, these claims are also allowable for  
3 their own recited features which are not disclosed, taught or suggested by the cited  
4 references, either alone or in combination.

5       **Claim 61** has been amended and, as amended, recites one or more  
6 computer readable media having computer-readable instructions thereon which,  
7 when executed by one or more processors, cause the one or more processors to  
8 implement a cross-language reading wizard comprising [emphasis added]:

- 9       • a user interface configured to allow a user to select existing text in a  
10 non-native language and view a translation of the selected text in a  
11 native language;
- 12       • a parser for parsing selected text into individual translation units, the  
13 parser comprising a part-of-speech/base noun phrase identification  
14 module for tagging individual words with identifiers,
- 15       • a word translation selector for choosing candidate word translations  
16 for the translation units, and
- 17       • a translation generator for translating the candidate word translations  
18 into corresponding words or phrases in the native language that can  
19 be presented to the user via the user interface.

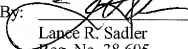
20       In making out the rejection of this claim, the Office argues that the claim is  
21 anticipated by Duan, using similar reasoning as that used in the rejection of claim  
22 1. For the reasons set forth above in regards to claim 1, Applicant respectfully but  
23 strongly submits that Duan does not anticipate this claim. Accordingly, this claim  
24 is allowable.  
25

1 **Conclusion**

2 Applicant respectfully submits that all of the claims are in condition for  
3 allowance. In the event the Office's next anticipated action is to be anything other  
4 than issuance of a Notice of Allowability, Applicant respectfully requests a telephone  
5 call for the purpose of scheduling an interview.

6  
7 Respectfully Submitted,

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9 Dated: 1/13/06

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